

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
	)	
v.	)	No. 4:17 CR 00404 HEA
	)	
MICHAEL GRADY,	)	
Defendant.	)	

**MICHEAL GRADY'S MOTION TO COMPEL  
WITNESS AND EXHIBIT LISTS**

NOW COMES the defendant, MICHAEL GRADY by and through his attorneys, QUINN A. MICHAELIS and JOSHUA B. ADAMS, and pursuant respectfully moves this Honorable Court to compel the government to produce to Mr. Grady a list of intended witnesses and proposed exhibits instanter. In support of his motion, Mr. Grady states the following.

1. Trial in this matter is scheduled for March 22, 2021, over four years after Mr. Grady's arrest. The pre-trial conference is scheduled for March 16, 2021.
2. The government has tendered voluminous discovery in this case comprised of reports from various law enforcement agencies, telephone records, search warrants, and expert witness discovery.
3. Trial is three weeks from today. As of this filing, the government has not tendered to the defense team a list of the witnesses it intends to call other than its expert disclosures, nor a list of proposed exhibits.

4. On February 5, 2021, after a request from counsel for exhibit and witness lists, the government stated that it was working on the exhibit list, and if counsel had a specific question about a particular area of evidence, to contact him.
5. Mr. Grady requires these lists to prepare motions in limine, but to also prepare his cross-examination for the government's case in chief. Moreover, there may be witnesses counsel will object to calling, or evidence counsel may move, *in limine*, to exclude. Providing this list three weeks prior to trial conserves judicial resources, so the court does not deal with these issues on a rolling basis during the course of trial.

WHEREFORE, the defendant, MICHAEL GRADY, respectfully requests that this Honorable Court compel the government to produce, instant, a list of its proposed exhibits and witness list.

Respectfully submitted,

s/ Quinn A. Michaelis  
Counsel for Michael Grady

s/ Joshua B. Adams  
Counsel for Michael Grady

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### CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2021 I electronically filed the above **DEFENDANT'S MOTION TO COMPEL WITNESS AND EXHIBIT LISTS** with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on February 28, 2021

By His Attorney,

s/ Quinn A. Michaelis  
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